

# EXHIBIT Q

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**From:** Chris Carmichael <ccarmichael@henderson-parks.com>  
**Sent:** Tuesday, August 22, 2023 2:01 PM  
**To:** de Gramont, Alexandre <Alexandre.deGramont@dechert.com>  
**Cc:** Liu, Angela <Angela.Liu@dechert.com>; Victor P. Henderson <VPHenderson@henderson-parks.com>; Hayes, Michael <Michael.Hayes@huschblackwell.com>  
**Subject:** RE: Abubakar v. Chicago State University, 1:23-cv-05099

[EXTERNAL EMAIL]

Hello Alex,

On your first question below, the key fact – that Bola A. Tinubu graduated from Chicago State University in June 1979 with a Bachelor of Science in Business Administration, with honors – is accurate and true. And, we believe you’ve already seen the document to that effect. With regard to the diplomas, there was a scrivener’s error in the diploma issued in response to the illegal subpoena about the date of graduation/award of the degree. Likely the result of human error typing in the wrong digit, the 27 should have been 22. The remainder of the differences reflect formatting changes that occurred over time, including in the logo and font used. Lastly, because a diploma bears the signatures of officials of the school, those too change over time, and the signatures on a diploma are of the personnel in those positions at the time of issuance. Hence, personnel in those positions at the time of issuance have signature lines on a diploma issued recently. Likewise, an earlier diploma would bear the names of the personnel in those positions at the time. When exactly the earlier diploma was formally issued is not known, but it’s accurate nonetheless, and the date or reason for the issuance is irrelevant.

On your second question, Michael I’m sure can elaborate later, but as I mentioned on our call that Illinois subpoena contained only a request for a deposition, albeit overbroad. Now there is both a document request and a deposition request, both of which are expansive and go well beyond even the “issue” about the earlier provided documents. Delving into a person’s academic records is invasive according to federal and state law, and would be opposed on principle. Regardless, since President Tinubu graduated with the degree, the other “questions” are immaterial. Although President Tinubu might want to know why CSU responded to an illegal subpoena and created a new diploma, that issue is really of no import to anyone else.

We’ll file our response tomorrow laying out these points and others, and supply an affidavit from CSU attesting to the essential points above.

Best,  
Chris

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**From:** de Gramont, Alexandre <Alexandre.deGramont@dechert.com>  
**Sent:** Thursday, August 17, 2023 4:21 PM  
**To:** Hayes, Michael <Michael.Hayes@huschblackwell.com>; Chris Carmichael <ccarmichael@henderson-parks.com>  
**Cc:** Liu, Angela <Angela.Liu@dechert.com>; Victor P. Henderson <VPHenderson@henderson-parks.com>  
**Subject:** RE: Abubakar v. Chicago State University, 1:23-cv-05099

Dear Counsel,

Thank you for the meet-and-confer call we had last week.

First, if I recall correctly, you were going to discuss further whether your clients would agree to at least proffer an explanation as to the discrepancies between the two diplomas. As discussed, it is unlikely that your explanation will obviate the need for a deposition, but at the very least, it might streamline it. And again, if your position is that there is an innocent explanation, I fail to see why we need to wait until a deposition to obtain it. We may want to test the explanation. But why are your clients not willing to provide it in the meantime?

Second, I asked Mike if CSU had any objections to the document requests or deposition topics, so that we could attempt to resolve or narrow them in advance of any opposition to be filed by CSU next week.

Please let us know.

Best, Alex

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**From:** Hayes, Michael <[Michael.Hayes@huschblackwell.com](mailto:Michael.Hayes@huschblackwell.com)>  
**Sent:** Monday, August 7, 2023 9:55 AM  
**To:** Chris Carmichael <[ccarmichael@henderson-parks.com](mailto:ccarmichael@henderson-parks.com)>; de Gramont, Alexandre <[Alexandre.deGramont@dechert.com](mailto:Alexandre.deGramont@dechert.com)>  
**Cc:** Liu, Angela <[Angela.Liu@dechert.com](mailto:Angela.Liu@dechert.com)>; Victor P. Henderson <[VPHenderson@henderson-parks.com](mailto:VPHenderson@henderson-parks.com)>  
**Subject:** RE: Abubakar v. Chicago State University, 1:23-cv-05099

[EXTERNAL EMAIL]

I, too, am available this Wednesday at either 9am or 2pm.

Thanks,

Mike

**Michael Hayes**  
**Partner**  
Direct: 312-341-9830  
[Michael.Hayes@huschblackwell.com](mailto:Michael.Hayes@huschblackwell.com)

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**From:** Chris Carmichael <[ccarmichael@henderson-parks.com](mailto:ccarmichael@henderson-parks.com)>  
**Sent:** Sunday, August 6, 2023 6:52 PM  
**To:** de Gramont, Alexandre <[Alexandre.deGramont@dechert.com](mailto:Alexandre.deGramont@dechert.com)>  
**Cc:** Hayes, Michael <[Michael.Hayes@huschblackwell.com](mailto:Michael.Hayes@huschblackwell.com)>; Liu, Angela <[Angela.Liu@dechert.com](mailto:Angela.Liu@dechert.com)>; Victor P. Henderson <[VPHenderson@henderson-parks.com](mailto:VPHenderson@henderson-parks.com)>  
**Subject:** Re: Abubakar v. Chicago State University, 1:23-cv-05099

[EXTERNAL EMAIL]

I can do 9 am or 2 pm.

On Aug 6, 2023, at 2:07 PM, de Gramont, Alexandre <[Alexandre.deGramont@dechert.com](mailto:Alexandre.deGramont@dechert.com)> wrote:

All – Thanks for your emails. Below are times when we can be available on Wednesday. Our preference would be for 2:30 pm CT, but if that doesn't work, please suggest one of the other times below. Best, Alex

9 am (CT)  
2 pm (CT)  
2:30 pm (CT)  
3:00 pm (CT)

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**From:** Chris Carmichael <[ccarmichael@henderson-parks.com](mailto:ccarmichael@henderson-parks.com)>  
**Sent:** Saturday, August 5, 2023 7:15 PM  
**To:** Hayes, Michael <[Michael.Hayes@huschblackwell.com](mailto:Michael.Hayes@huschblackwell.com)>  
**Cc:** de Gramont, Alexandre <[Alexandre.deGramont@dechert.com](mailto:Alexandre.deGramont@dechert.com)>; Liu, Angela <[Angela.Liu@dechert.com](mailto:Angela.Liu@dechert.com)>; Victor P. Henderson <[VPHenderson@henderson-parks.com](mailto:VPHenderson@henderson-parks.com)>  
**Subject:** Re: Abubakar v. Chicago State University, 1:23-cv-05099

[EXTERNAL EMAIL]

Correction, before 1:30 central.

On Aug 5, 2023, at 7:12 PM, Chris Carmichael <[ccarmichael@henderson-parks.com](mailto:ccarmichael@henderson-parks.com)> wrote:

I'm open before 3:30 CST on Wednesday.

On Aug 5, 2023, at 6:55 PM, Hayes, Michael <[Michael.Hayes@huschblackwell.com](mailto:Michael.Hayes@huschblackwell.com)> wrote:

All, sorry but I am not available on Tuesday. I am open most of the day on Wednesday (have a few things scheduled but could move them around), so please pick a time that day that works for all of you and I'll make it work for me.

Thanks,

Mike

**Michael Hayes**  
**Partner**  
Direct: 312-341-9830  
[Michael.Hayes@huschblackwell.com](mailto:Michael.Hayes@huschblackwell.com)

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**From:** Chris Carmichael <[ccarmichael@henderson-parks.com](mailto:ccarmichael@henderson-parks.com)>  
**Sent:** Saturday, August 5, 2023 3:29 PM  
**To:** de Gramont, Alexandre <[Alexandre.deGramont@dechert.com](mailto:Alexandre.deGramont@dechert.com)>; Liu, Angela <[Angela.Liu@dechert.com](mailto:Angela.Liu@dechert.com)>  
**Cc:** Hayes, Michael <[Michael.Hayes@huschblackwell.com](mailto:Michael.Hayes@huschblackwell.com)>; Victor P.

Henderson <[VPHenderson@henderson-parks.com](mailto:VPHenderson@henderson-parks.com)>

**Subject:** RE: Abubakar v. Chicago State University, 1:23-cv-05099

[EXTERNAL EMAIL]

2 PM on Tuesday can work on my end.

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**From:** de Gramont, Alexandre <[Alexandre.deGramont@dechert.com](mailto:Alexandre.deGramont@dechert.com)>

**Sent:** Friday, August 4, 2023 12:24 PM

**To:** Chris Carmichael <[ccarmichael@henderson-parks.com](mailto:ccarmichael@henderson-parks.com)>; Liu, Angela <[Angela.Liu@dechert.com](mailto:Angela.Liu@dechert.com)>

**Cc:** Hayes, Michael <[Michael.Hayes@huschblackwell.com](mailto:Michael.Hayes@huschblackwell.com)>; Victor P. Henderson <[VPHenderson@henderson-parks.com](mailto:VPHenderson@henderson-parks.com)>

**Subject:** RE: Abubakar v. Chicago State University, 1:23-cv-05099

Dear Chris,

In other federal courts, including in other 1782 proceedings, we have stipulated to intervention and we could have always filed a joint or consent motion. Also, as I am sure you know, it is customary (and in most courts required) to submit proposed orders. Even if the Court had entered the order, either you or CSU could have moved to quash. In any event, we have responded to the Court that we consent to Mr. Tinubu's intervention and to his submitting his opposition on or before August 11. Also, since we did not hear otherwise from you, we have asked to submit our reply on or before Aug. 16. I am attaching a courtesy copy of the response hereto.

But in the future, let's try to reach out to one another and meet and confer on these issues. We might reach compromise on some of the issues, and thereby avoid submitting unnecessary filings to the Court while also saving time and money. As I think about it, we probably should have asked for Mike's comments on scheduling too. But if CSU has objections beyond those presented by Mr. Tinubu, let's discuss next week to see if can work those out. If we can't, we can discuss a way to put them to the Court for resolution.

Let me suggest that we have our meet-and-confer on the proposed discovery on Tuesday, August 8, at 2pm CT. Chris, please let us know if that works for you, and Mike, please let us know if that works for you. If so, we will send around a Teams invite.

Best regards, Alex

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**From:** Chris Carmichael <[ccarmichael@henderson-parks.com](mailto:ccarmichael@henderson-parks.com)>

**Sent:** Friday, August 4, 2023 12:51 PM

**To:** Liu, Angela <[Angela.Liu@dechert.com](mailto:Angela.Liu@dechert.com)>  
**Cc:** de Gramont, Alexandre <[Alexandre.deGramont@dechert.com](mailto:Alexandre.deGramont@dechert.com)>;  
Hayes, Michael <[Michael.Hayes@huschblackwell.com](mailto:Michael.Hayes@huschblackwell.com)>; Victor P.  
Henderson <[VPHenderson@henderson-parks.com](mailto:VPHenderson@henderson-parks.com)>  
**Subject:** RE: Abubakar v. Chicago State University, 1:23-cv-05099

[EXTERNAL EMAIL]

Good morning Angela, we don't believe you should have been surprised by the motion, as that is, in our view, the proper vehicle to intervene or join the proceedings. At least in the ND ILL, we do not believe that parties can simply stipulate as to who can and cannot join a proceeding.

We also filed the motion quickly, and did not have time to reach out, because the Applicant had already submitted a draft order granting the Application, and that draft order required CSU to comply. If the intention was to have either CSU or Mr. Tinubu heard from before the Application was granted and the discovery issued, that draft order did the opposite.

We're happy to discuss further on Tuesday afternoon.

Best,  
Chris

**Christopher W. Carmichael** | **hendersonPARKS**

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<image001.jpg>

<image002.png>

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**From:** Liu, Angela <[Angela.Liu@dechert.com](mailto:Angela.Liu@dechert.com)>  
**Sent:** Thursday, August 3, 2023 9:24 PM  
**To:** Hayes, Michael <[Michael.Hayes@huschblackwell.com](mailto:Michael.Hayes@huschblackwell.com)>; Chris Carmichael <[ccarmichael@henderson-parks.com](mailto:ccarmichael@henderson-parks.com)>; Victor P. Henderson <[VPHenderson@henderson-parks.com](mailto:VPHenderson@henderson-parks.com)>  
**Cc:** de Gramont, Alexandre <[Alexandre.deGramont@dechert.com](mailto:Alexandre.deGramont@dechert.com)>  
**Subject:** Abubakar v. Chicago State University, 1:23-cv-05099

Dear Counsel,

We were surprised to receive Mr. Tinubu's motion to intervene, given that we previously advised you and stated in our petition that we would stipulate to your intervention. We plan to file a short response tomorrow, advising that we have already agreed to Mr. Tinubu's intervention and that we agree that Mr. Tinubu may file a response to the application on or before August 11. We would then propose to the Court that Petitioner will file its reply on or

before August 16. Please let us know if that date is acceptable to you.

We continue to be puzzled by Mr. Tinubu's vigorous opposition to our asking CSU about documents that are already in the public domain and/or have already been submitted in the Nigerian proceedings, so that we can learn CSU's position on whether, how, and when they were provided to other Nigerian litigants, and CSU's position on the authenticity of the documents. If there is an explanation for the discrepancies we have identified, we would think that Mr. Tinubu would be eager to provide it. If you would like to provide an explanation to us, we are happy to consider it. That might preclude the need for, or at least expedite, the deposition. In candor, the vehemence of Mr. Tinubu's opposition to this discovery is increasing rather than mitigating our suspicions.

In any event, as I'm sure you know, Local Rule 37.2 requires that the parties undertake good faith efforts to resolve discovery motions. As you will see below (under my signature line), Judge Gilbert emphasizes the importance of the parties' good faith compliance with that rule. Accordingly, we would like to have a meet-and-confer with you and counsel for CSU, to continue the discussions we began in advance of submitting the Application. We would be grateful if you and counsel for CSU would let us know your availability on Monday or Tuesday (August 7 or 8) for a joint call. In addition to discussing Mr. Tinubu's concerns, we would like to know if CSU has any objections or concerns about any of the document requests or deposition topics that we should discuss.

Also, given the briefing schedule, it is possible that we will need to push back the dates in our discovery requests for the production of documents and the deposition, depending on how and when the Court rules. Accordingly, we would ask counsel for CSU to provide alternative dates during the week of August 28 and September 4 for the deposition. (We assume it will be relatively easy for CSU to produce whatever documents it has already produced to other Nigerian litigants, should the Court so order.) During our meet-and-confer, we can then try to agree on alternative dates that are convenient for counsel as well as for the deponent.

Sincerely,

**Angela Liu** (she/her/hers)  
Partner

**Dechert LLP**

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<image003.jpg>

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